

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

GEORGE WELCH

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:20-cv-122-NBB-JMV

CITY OF HERNANDO, MISSISSIPPI, ET AL.

DEFENDANTS

**PLAINTIFF'S RESPONSE IN OPPOSITION OF DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Plaintiff, George Welch, by and through undersigned Counsel, respectfully submits his response in opposition of Defendants' Motion for Summary Judgment. Defendants are not entitled to summary judgment as there remains genuine issues of material fact, which precludes summary judgment. Plaintiff submits his memorandum in opposition to Defendants' motion, which lays out why summary judgment should be denied, to be filed contemporaneously. Furthermore, Plaintiff submits the following to be exhibits to his response and memorandum in opposition of Defendants' motion:

Exhibit "A" – George Welch Deposition transcript excerpts

Exhibit "B" – Dispatch Log

Exhibit "C" – Calls for Service View Call Report dated March 29, 2017

Exhibit "D" – Officer Brian Bell Deposition transcript excerpts

Exhibit "E" – Calls for Service View Call Report dated December 23, 2018

Exhibit "F" - Incident Narratives dated December 23, 2018

Exhibit "G" - Desoto County Court hearing transcript excerpts

Exhibit "H"- Officer Joseph Harris Deposition transcript excerpts

Exhibit “I” – Taser Log

Exhibit “J” – Hernando Municipal Court Orders

Exhibit “K” – Photos of George Welch’s injuries

Exhibit “L” – Lieutenant Robert Scott Deposition transcript excerpts

Exhibit “M” – Chief Scott Worsham Deposition transcript excerpts

Exhibit “N” – Officer Joseph Harris certificate

Exhibit “O” – Bankruptcy Schedule

For the reasons stated in his memorandum, Plaintiff respectfully prays this Court deny Defendants’ motion for summary judgment.

Respectfully submitted this 13th of July 2021,

ATTORNEYS FOR PLAINTIFF

/s/ John Keith Perry, Jr.

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CERTIFICATE OF SERVICE

I certify that I have this day electronically filed the forgoing with the Clerk of the Court, using the CM/ECF system, which sent notification to the following counsel of record:

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This the 13th day of July 2021.

/s/ John Keith Perry, Jr.
John Keith Perry, Jr.